

EXHIBIT F

INDEX IN SUPPORT OF MOTION TO SEAL
TRIALCARD MOTION (ECF NO. 312)

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury that Would Result if Relief Is Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing
<u>Letter from E. Evans Wohlforth, Jr. Esq. regarding SaveOn's Motion to Compel TrialCard Documents dated April 19, 2024 (ECF No. 312)</u>		JJHCS requests the redaction of information and discussion in the April 19 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information, including the administration of the CarePath program and work by TrialCard.	If filed on the public docket, these portions of the April 19 letter would reveal confidential material relating to JJHCS's sensitive business information. Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Page 2	("runs . . . ")					
Page 3	(" . . . "), (" . . . "), ("TrialCard . . . J&J"), ("all . . . J&J"), ("J&J . . . desk"), ("feedback . . . materials"), ("J&J . . . ineligible"), ("TrialCard . . . litigation"), ("Work . . . CarePath"), ("July . . . ESI"), ("who . . . employees")					
Page 3,	("defines . . . work"), ("Work . . ."), ("Work . . .")					

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note 1						
Page 4	(“participated . . . employees”), (“TrialCard . . . SaveOn”), (“November . . . Gooch”), (“draft . . . plans”)					
Page 4, note 3	(“J&J . . . patients”)					
Page 5	(“providing . . . date”), (“held . . .”), (“TrialCard . . . recommendation”), (“listing . . . Investigations”), (“TrialCard . . . implemented”)					
Page 7	(“shared . . .”), (“shared . . .”), (“shared . . .”)					

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Page 8	("providing . . . MSA")					
Page 13	("The . . . hereunder"), ("gives . . . provided")					
Page 14	("TrialCard . . . hereby"), ("TrialCard . . . inquiry")					
Page 16	("J&J . . . J&J")					
Exhibits 1, 2, 9, & 15	Sealing of emails and confidential attachments regarding TrialCard contracts and work orders	JJHCS requests the redaction of information in certain exhibits to the April 19 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains	If filed on the public docket, these exhibits to the April 19 letter would reveal confidential material relating to JJHCS's sensitive business information. Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general	None	None
Exhibits 3, 4 & 7	Sealing of Master Services Agreement with TrialCard					
Exhibits	Redaction of discovery letters regarding					

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5, 6, 22, 38, 42, 50 & 53	TrialCard issues and relationship	that these documents and exhibits contain sensitive business information, including the administration of the CarePath program and JJHCS's contractual relationship with and work performed by TrialCard. Certain of these exhibits were produced by non-party TrialCard.	at a competitive disadvantage if its competitors secured the information.	public. No less restrictive alternative is available or practicable.		
Exhibits 8, 10, 13, 14, 17, 18, 19, 20, & 41	Sealing of emails and confidential attachments regarding the CarePath program and work by TrialCard					
Exhibits 11 & 37	Redaction of discovery responses regarding CarePath program					

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Exhi bits 29 & 30	Sealing of privilege logs with details of confidential material					
Exhi bit 36	Redaction of subpoena quoting confidential Trial Card documents					
Exhi bit 40 & 41	Sealing of confidential sound recordings					
<u>2024.05.07 JJHCS Opposition to Trial Card Motion (ECF No. 312-57)</u>		JJHCS requests the redaction of information and discussion in the May 7 letter that is not known to the general public and which the	If filed on the public docket, these portions of the May 7 letter would reveal confidential material relating to JJHCS's sensitive business information.	JJHCS requests the sealing of only the information that will reveal confidential	None	None
Page 3	("described . . . other"), ("stating . . . undertaking")					

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Page 4	("forwarding . . . TrialCard"), ("email . . . program"), ("email . . . findings")	parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information, including the administration of the CarePath program and work by TrialCard.	Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	information that is not known to the general public. No less restrictive alternative is available or practicable.		
Pages 5-6	("that . . . discovery")					
Page 10	("JJHCS . . . thereunder"), ("For . . . billing")					
Page 10, note 6	("Sections . . . litigation")					
Page 11	("maintained . . . Orders"), ("ask . . . Program"), ("identifying . . . feeds"), ("gives . . . performs")					

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Page 12	("precludes . . . PHI"), ("Unless . . . Order")					
Page 13, note 7	("JJHCS . . . relationship")					
Page 17	("JJHCS . . . undertaking")					
Page 18	("establishing . . . client"), ("CAP . . . date"), ("requests . . . patients"), ("the . . . Investigations")					
Page 18, note 9	("internally . . . produced")					
Page 19	("brainstormed . . .")					

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Page 19, note 9	(“the . . . seeks”), (“TrialCard . . . CAPa”)					
Pages 19-20, note 11	(“is . . . SaveOnSP”)					
Page 20	(“precluding . . .”)					
Page 20, note 12	(“a . . . practices”)					
Page 24	(“. . .”), (“. . .”)					
Page 25	(“. . .office”)					

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Exhibit 1	Sealing of Master Services Agreement	JJHCS requests the redaction of information in certain exhibits to the May 7 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information, including the administration of the CarePath program and	If filed on the public docket, these exhibits to the May 7 letter would reveal confidential material relating to JJHCS's sensitive business information. Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Exhibits 4, 16, 17, 19, 21, 22, 28, 34, 36 & 37	Redaction of discovery letters regarding TrialCard issues					
Exhibits 5, 6 & 7	Sealing of emails regarding work performed by TrialCard					

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Exhi bits 14 & 20	Redaction of discovery responses regarding the administration of the CarePath program	work performed by TrialCard.				
Exhi bit 18	Redaction of subpoena quoting confidential TrialCard documents					
Exhi bit 30	Sealing of confidential documents regarding work performed by TrialCard					
Exhi bit 39	Sealing of TrialCard record					
Exhi bits 41, 41A, 42, 42A	Sealing of confidential sound recordings and redaction of transcripts containing confidential health information					

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<u>024.05.17 -- SaveOn TrialCard Reply Brief</u> (ECF No. 312-104)		JJHCS requests the redaction of information and discussion in the May 17 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information, including the administration of the CarePath program and	If filed on the public docket, these portions of the May 17 letter would reveal confidential material relating to JJHCS's sensitive business information. Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Page 3	("the . . . Agreement"), ("complete . . . hereunder"), ("to . . . Agreement")					
Page 4	("audit . . . thereunder"), ("It . . . J&J"), ("gives . . . so"), ("to . . . purposes")					
Page 5, note 1	("describes . . ."), ("which . . ."), ("does . . .")					
Page 6	("accessing . . ."), ("TrialCard . . . herein"), ("at . . . here"), ("Unless . . . de-identified"),					

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	("notwithstanding . . . Orders")	work performed by TrialCard.				
Page 7	("lets . . . litigation")					
Page 12	("J&J . . . J&J"), ("J&J . . . effective"), ("J&J . . . employees"), ("TrialCard . . . issue"), ("TrialCard . . . Janssen"), ("letter . . . address"), ("TrialCard . . . CarePath")					
Page 13	("pay . . .")					
Page 15	("J&J . . .")					
Page 16, note 9	(" . . . patients"), (" . . . Program"), (" . . . Program")					

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Page 17	(“the . . . SaveOnSP”), (“systematic . . . maximizers”)					
Page 17, note 10	(“proposed . . . conducted”), (“characterizes . . . recommendation”), (“the . . . recommendation”), (“the . . . itself”)					
Page 18, note 12	(“J&J . . . requests”)					
Exhibit 56	Sealing of confidential patient health information	JHCS requests the redaction of information in certain exhibits to the May 17 letter	If filed on the public docket, these exhibits to the May 17 letter would reveal confidential material relating	JHCS requests the sealing of only the information	None	None

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Exhibits 58 & 67	Redaction of discovery letter regarding work performed by TrialCard	that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information, including the administration of the CarePath program, work performed by TrialCard, and confidential health information for patients.	to JJHCS's sensitive business information. Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information. It would also improperly disclose patient health information.	that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.		
Exhibits 62, 63 & 64	Sealing of emails and confidential attachments regarding the administration of the CarePath program and work performed by TrialCard					